

Office of the Chapter 13 Standing Trustee

Isabel C. Balboa, Chapter 13 Standing Trustee†

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March 23, 2020

The Honorable Jerrold N. Poslusny, Jr.
United States Bankruptcy Court
P.O. Box 2067
Camden, New Jersey 08102

RE: Chapter 13 Bankruptcy
Case No: 20-13637 (JNP)
Debtor's Name: Jeffrey B. Martin

Dear Judge Poslusny:

The above chapter 13 case was filed on March 2, 2020. The Debtor lists a shore house at 3205 West Avenue, Ocean City, New Jersey among his real estate assets. The meeting of creditors has not been held and confirmation is not scheduled until May 6, 2020.

The Debtor filed a Motion to sell 3205 West Avenue, Ocean City, New Jersey on March 10, 2020, to be heard on March 24, 2020, on shortened time. On March 16, 2020, the Trustee filed an objection to the Debtor's proposed disposition of non-exempt proceeds. On March 18, 2020, Debtor filed a brief in response and opposition to the Trustee's objection.

The Trustee is mindful of the urgency of the Motion for approval for the sale of real estate. To facilitate the sale, the Trustee respectfully requests that the proceeds in dispute be held in trust in the Debtor's attorney trust account pending further adjudication by this court and to afford the trustee an opportunity to research and respond to Debtor, should the court enter an order allowing the sale of Ocean City real estate on March 24, 2020. The Trustee's objection to the form of order remains.

I am available to appear via Court Solutions, if Your Honor requires our appearance.

Respectfully submitted,

**OFFICE OF THE CHAPTER 13
STANDING TRUSTEE**

/s/ Isabel C. Balboa

Isabel C. Balboa
Chapter 13 Standing Trustee

ICB/kt
Enclosure(s)
c: Robert N. Braverman, Esquire